IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

MICROSOFT CORPORATION, a Washington corporation,	))))	
Plaintiff,	))	Civil Action No: 1:16-cv-00993 (GBL/TCB)
v.	))	
JOHN DOES 1-2, CONTROLLING A COMPUTER NETWORK AND THEREBY INJURING PLAINTIFF AND ITS CUSTOMERS,	)))))	
Defendants.	)))))	

MICROSOFT'S MOTION FOR DEFAULT JUDGMENT
AND PERMANENT INJUNCTION

Plaintiff Microsoft Corporation ("Microsoft"), by counsel, pursuant to Federal Rules of

Civil Procedure 55(b)(2), 53, 65(a) and (c), the Computer Fraud and Abuse Act (18 U.S.C. §

1030), the Electronic Communications Privacy Act (18 U.S.C. § 2701), the Lanham Act (15

U.S.C. §§ 1114, 1116, & 1125), the Anticybersquatting Consumer Protection Act (15 U.S.C. §

1125(d)), the common law, the All Writs Act, (28 U.S.C. § 1651) and the Court's inherent

equitable authority, respectfully moves the Court for entry of a default judgment and permanent

injunction against the Defendants.

As discussed in Microsoft's brief in support of this motion for default judgment and

permanent injunction, Microsoft requests an order entering default judgment against the

Defendants who have failed to answer, plead or otherwise defend this action, and a permanent

injunction preventing Defendants from continuing their harmful activities by providing

Microsoft control over the existing Strontium domains and appointing a Court Monitor to

oversee Defendants' compliance with the permanent injunction.

The requested relief is necessary to halt the Strontium operation that is causing irreparable injury to Microsoft and its customers. Microsoft respectfully requests that the Court grant this Motion.

Dated: June 29, 2017   Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2017, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system. Copies of the forgoing were also served on the defendants listed below by electronic mail:

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